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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JASMINE A. EASLEY, individually,

Plaintiff,

vs.

AMERIPRISE FINANCIAL SERVICES,
INC., n/k/a Ameriprise Financial Services,
LLC, a Delaware Corporation,

Defendant.

Case No. 2:19-cv-02214-APG-BNW

**DEFENDANT'S UNOPPOSED MOTION
FOR AN EXEMPTION FROM THE ENE
ATTENDANCE REQUIREMENTS**

Defendant Ameriprise Financial Services, Inc., n/k/a Ameriprise Financial Services, LLC, by and through its counsel of record, hereby files this Motion respectfully requesting an exemption from the Early Neutral Evaluation ("ENE") attendance requirements.

The Order Scheduling Early Neutral Evaluation ("ENE") Session (ECF No. 17) sets the ENE for June 8, 2020 and requires an officer or representative with binding authority to settle the matter to attend in person. Ameriprise's corporate representative with binding settlement authority (its VP and Chief Counsel, Employment Law Group) works in Minneapolis, MN, where Ameriprise is headquartered, and will be unable to fly to Las Vegas due to COVID-19 related travel concerns and restrictions. Defense counsel has discussed this matter with Plaintiff's counsel and proposed alternative solutions. Plaintiff is agreeable to having Ameriprise's corporate representative participate at the ENE telephonically and thus has no opposition to this Motion as reflected by signature of Plaintiff's counsel below. Thus, Defendant requests that the Court grant an exemption

to the in-person attendance requirement for the corporate representative of Ameriprise, and allow her to participate at the ENE telephonically for good cause. If the Court is not inclined to permit telephonic participation, Defendant alternatively requests that the Court continue the ENE for 30-60 days so that Ameriprise's corporate representative can participate in person.

Dated: May 18, 2020

Respectfully submitted,

/s/ Andre M. Lagomarsino

ANDRE M. LAGOMARSINO, ESQ.
LAGOMARSINO LAW

Attorney for Plaintiff

Respectfully submitted,

/s/ Amy Thompson

MONTGOMERY PAEK, ESQ.
AMY THOMPSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant

ORDER

Based on the representations from counsel above and for good cause shown, this Court grants Defendant's unopposed motion for its corporate representative to be exempt from the in-person attendance requirement of the ENE and to participate telephonically instead.

IT IS SO ORDERED.

Dated this 19th day of May 2020.


UNITED STATES MAGISTRATE JUDGE

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